# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA GREENVILLE DIVISION

Auto-Owners Insurance Company,	)
Plaintiff,	)
v.	)
Komatsu America Corp., Linder Industrial Machinery Company, and Mitchell Distributing Company, LLC,	C.A. No. 6:07-CV-00850-HMH
Defendants.	)
	, )

# CONSENT MOTION FOR ENTRY OF A STIPULATED CONFIDENTIALITY ORDER

The Parties, through counsel, hereby file a joint motion for the entry of a Stipulated Confidentiality Order in this action.

- 1. The Parties represent that certain information, documents and things to be produced in this action may be confidential commercial information and/or proprietary trade secrets.
- 2. In light of the nature of this action, the Parties have propounded and received discovery requests seeking the disclosure of confidential information that may be deemed confidential under applicable law; and that third parties, likewise, may have received subpoenas requesting the production of confidential information.
- 3. The Parties consent to the entry of the attached confidentially order under Rule 26 (c) of the Federal Rules of Civil Procedure.

WHEREFORE, the Parties jointly move the Court for entry of the Stipulated Confidentiality Order filed contemporaneously herewith.

This the 19th day of December, 2007.

#### /s/John D. Harjehausen

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## **CERTIFICATE OF SERVICE**

I hereby certify that all parties of record were served copies of this **CONSENT MOTION FOR ENTRY OF A STIPULATED CONFIDENTIALITY ORDER** via email and the electronic filing system of the District of South Carolina

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This the 19th day of December, 2007.

/s/	Frank	W.	Gibbes	
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